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Attorney for Defendant
CYNTHIA SEELEY

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:20-CR-0202 WBS
)	
Plaintiff,)	
)	STIPULATION AND ORDER
vs.)	CONTINUING STATUS CONFERENCE
)	AND EXCLUDING TIME
CYNTHIA SEELEY,)	
)	
Defendant.)	Judge: Hon. William B. Shubb
)	Date: July 25, 2022
)	Time: 9:00 a.m.
)	

Plaintiff, United States of America, by and through its
counsel of record, and defendant, by and through her counsel of
record, hereby stipulate as follows:

1. By previous order, this matter was set for status
conference on July 25, 2022.

2. By this stipulation, defendant moves to continue the
status conference until September 26, 2022, and to exclude time
between July 25, 2022, and September 26, 2022, under Local Code
T4.

1 3. The parties agree and stipulate, and request that the
2 Court find the following:

3 a) Defense counsel requests additional time to obtain
4 records and to consult with an expert, which he believes
5 will assist in the resolution or disposition of this case.
6 Once completed, defense counsel will need additional time
7 to confer with his client, who resides in Butte County and
8 typically requires an in-person meeting.

9 b) Additionally, defense counsel has asked government
10 counsel to meet with him and an expert after the records
11 have been reviewed to discuss possible resolution of the
12 case short of trial. Defense counsel believes the meeting
13 is necessary to provide effective representation.

14 c) Counsel for defendant believes that failure to grant
15 the above-requested continuance would deny the defense the
16 reasonable time necessary for effective preparation, taking
17 into account the exercise of due diligence.

18 d) The government does not object to the continuance.

19 e) Based on the above-stated findings, the ends of
20 justice served by continuing the case as requested outweigh
21 the interest of the public and the defendant in a trial
22 within the original date prescribed by the Speedy Trial
23 Act.

24 f) For the purpose of computing time under the Speedy
25 Trial Act, 18 U.S.C. § 3161, et seq., within which trial
26 must commence, the time period of July 25, 2022, to
27 September 26, 2022, inclusive, is deemed excludable
28

pursuant to 18 U.S.C. § 3161(h) (7) (A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Respectfully Submitted,

Dated: July 18, 2022

/s/ T. Zindel
TIMOTHY ZINDEL
Attorney for CYNTHIA SEELEY

PHILIP A. TALBERT
United States Attorney

Dated: July 18, 2022

/s/ T. Zindel for Shelley D. Weger
SHELLEY D. WEGER
Assistant U.S. Attorney

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O R D E R

The Court adopts the findings set forth above. The status conference is continued to September 26, 2022, at 9:00 a.m. and time is excluded through that date, commencing today, for the reasons and on the basis set forth above.

IT IS SO ORDERED.

Dated: July 19, 2022



WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE